

UNITED STATES	DOCUMENT
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA : CONSENT PRELIMINARY ORDER  
- v. - : OF FORFEITURE/  
SALIF NDAMA-TRAORE, : MONEY JUDGMENT  
Defendant. : 23 Cr. 265 (RMB)  
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WHEREAS, on or about May 31, 2023, SALIF NDAMA-TRAORE (the "Defendant"), among others, was charged in a two-count sealed Indictment, 23 Cr 265 (RMB) (the "Indictment"), with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349 (Count One); and conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1957(a) (Count Two);

WHEREAS, the Indictment included a forfeiture allegation as to Count Two of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of any and all property, real and personal, involved in the offense charged in Count Two of the Indictment, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Count Two of the Indictment;

WHEREAS, on or about July 17, 2024, the Defendant pled guilty to Count Two of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count Two of the Indictment and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in the offense charged in Count Two of the Indictment or any property traceable to such property, including but not limited to a sum of money in United States

currency equal to \$480,000, representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment and the property involved in the offense charged in Count Two of the Indictment to which the Defendant has pled guilty;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$480,000 in United States currency, representing the amount of property involved in the offense charged in Count Two of the Indictment, for which the Defendant is jointly and severally liable with his co-defendants Kyle Emordi, Keith Emordi, Amadou Tidiane Ba, Mohamed Nabil Elikplim Akinotcho, and Ibrahim Bocoum (collectively, the “Co-defendants”), to the extent forfeiture money judgments are entered against each of the Co-defendants in this case;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the property involved in the offense charged in Count Two of the Indictment cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Jane Chong, of counsel, and the Defendant and his counsel, Ken Womble, Esq. and Keith White, Esq., that:

1. As a result of the offense charged in Count Two of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$480,000 in United States currency (the “Money Judgment”), representing the amount of property involved in the offense charged in Count Two of the Indictment, for which the Defendant is jointly and severally liable with the Co-defendants to the extent forfeiture money judgments are entered against each of the Co-defendants in this case, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant SALIF NDAMA-TRAORE, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38<sup>th</sup> Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:   
JANE CHONG  
Assistant United States Attorney  
26 Federal Plaza  
New York, NY 10278  
(212) 637-2263

7/17/2024  
DATE

SALIF NDAMA-TRAORE

By:   
SALIF NDAMA-TRAORE

7/17/24  
DATE

By:   
KEN WOMBLE, ESQ.  
KEITH WHITE, ESQ.  
Attorneys for Defendant  
20 Vesey Street, Room 400  
New York, New York 10007

7/17/24  
DATE

SO ORDERED:

  
THE HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

7/17/2024  
DATE